

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,)	
)	
Plaintiff,)	
)	
vs.)	5:25-cv-00462-G
)	
PLAZA HOTELS, LLC;)	
STEVE KETTER;)	
MICHAEL WILEY;)	
OKC AIRPORT ES, LLC;)	
ESH STRATEGIES FRANCHISE, LLC;)	
KAJAL HOSPITALITY, LLC;)	
JALIYAN HOSPITALITY, INC.;)	
SUPER 8 WORLDWIDE, INC.;)	
CHAND & SAAJ HOSPITALITY, INC.;)	
RAMADA WORLDWIDE, INC.;)	
YASH ENTERPRISES, INC.;)	
HOWARD JOHNSON;)	
INTERNATIONAL, INC.;)	
NOOR HOTEL, LLC;)	
AMBICA, LLC;)	
OM, LLC;)	
INDRA, LLC; and)	
G6 HOSPITALITY FRANCHISING, LLC,)	
)	
Defendants.)	

**UNOPPOSED MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE
RESPOND TO COMPLAINT UNDER RULE 12**

COMES NOW, the Defendant, Chand & Saaj Hospitality, Inc. (“C&S”), pursuant to LCvR6.3, moves for an unopposed extension of time to file an answer or responsive pleading under Rule 12 of the Federal Rules of Civil Procedure, and in support states as follows:

1. Plaintiff Nancy R. (“Plaintiff”) initiated this litigation in the District Court of

Oklahoma County, Oklahoma, as Case No. CJ-2025-1850.

2. On April 23, 2025, Defendants Super 8 Worldwide, Inc., Days Inns Worldwide, Inc., Ramada Worldwide, Inc. and Howard Johnson International, Inc., removed this case to this Court pursuant to 28 U.S.C. § 1331. Doc. No. 1.
3. Defendant C&S's responsive pleading was due on April 30, 2025. Fed. R. Civ. P. 81(c).
4. Plaintiff and Defendant C&S agreed to an extension of time for Defendant C&S to respond to Plaintiff's Complaint (Doc. No. 1-2) by June 2, 2025.
5. C&S has not previously requested any extension of time to respond to the Complaint.
6. Plaintiff has no objection to the granting of C&S's requested extension.
7. Defendant C&S's request for leave is not made for any purpose of delay. Rather, the requested extension of time to respond to the Complaint would promote the just, speedy and inexpensive determination of this proceeding. FED. R. CIV. P. 1.
8. A proposed order is submitted contemporaneously with this filing.

WHEREFORE, Defendant Chand & Saaj, Inc. respectfully requests that the Court grant this Motion and extend the time for Defendant to file a responsive pleading under Rule 12 or otherwise respond to the Complaint by June 2, 2025.

Respectfully submitted,

SECREST, HILL, BUTLER & SECREST

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CERTIFICATE OF MAILING

This is to certify that on the 27th day of May, 2025, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF Registrants:

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